

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x  
GEORGE LAWSON,

Plaintiff,

05 Civ. 825(JSR)(HBP)

-against-

NEW YORK CITY BOARD OF EDUCATION, also  
known as NEW YORK CITY DEPARTMENT OF  
EDUCATION, CLEVELAND PERSON, LEIA  
MCKINLEY, MARLENE FILEWICH, FRANK  
POLIETTA, OLIVIA LYNCH, JOEL KLEIN, MARCEL  
KSHENSKY, MARY GORMAN AND HEIDI DIEN  
LUDWIG, individually and in their official capacities,

**AFFIDAVIT OF  
PHILIP CROWE IN SUPPORT  
OF DEFENDANTS'  
MOTION FOR  
SUMMARY JUDGMENT**

Defendants.  
----- x

STATE OF NEW YORK     )  
                                  ) ss.:  
COUNTY OF NEW YORK )

**PHILIP CROWE**, being duly sworn, deposes and says:

1. I am the Director of Certification and Licensing at defendant New York City Department of Education ("DOE"), and as such, I am familiar with the facts set forth below. I submit this affidavit in support of defendants' motion for summary judgment.

2. According to DOE records, plaintiff George Lawson was issued a Temporary License by the New York State Education Department ("NYSED") for the period September 1, 2000 through August 31, 2001. A Temporary License was<sup>1</sup> issued to an uncertified teacher and was valid for one year.

-----  
<sup>1</sup> In or about 2005, the NYSED stopped issuing Temporary Licenses.

3. To be employed as a probationary uncertified teacher in the New York City public school system, the holder of a Temporary License would also have had to obtain a New York City Preparatory Provisional Certificate ("PPC") – and the holder of this certificate was commonly referred to as a "PPT" or Preparatory Provisional Teacher. Just as with the Temporary License, the PPC was valid for one year. Mr. Lawson obtained a PPC for the period September 1, 2000 through August 31, 2001.

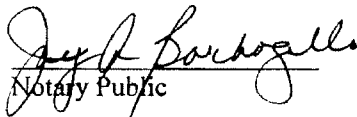
4. According to NYSED records, Mr. Lawson thereafter renewed his Temporary License and PPC for the period September 1, 2001 through August 31, 2002; and for the period September 1, 2002 through August 31, 2003.

5. According to NYSED records, on or about September 1, 2003, Mr. Lawson was issued an Internship Certificate based on the recommendation of Lehman College. The Internship Certificate was valid for a two year period and allowed Mr. Lawson to teach in the New York City public school system as a probationary employee.

6. According to NYSED records, Mr. Lawson's Internship Certificate expired on August 31, 2005.

  
PHILIP CROWE

Sworn to before me this  
24<sup>th</sup> day of August, 2010

  
Notary Public

JOY A. BARBAGALLO  
Commissioner of Deeds  
City of New York No. 2-10518  
Certificate filed in Kings County  
Commission Expires January 1, 2012